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November 12, 2015

Honorable Roanne L. Mann (*by ECF*)
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Krishtian Lopez v. City of New York, et al., 15 CV 0999 (JG) (RLM)

Dear Magistrate Judge Mann:

I represent defendants City of New York and Corizon Health, Inc. in the above-referenced action. I write with the parties' joint request for an extension of time of two business days to November 16, 2015, in which to provide the Court with the parties' status update as directed at the last conference. The parties anticipate that, as a result of the unusual history of this action, a motion for an enlargement of the discovery schedule will also be necessary.

The reason for this request is the scheduling conflicts of counsel. Counsel for plaintiff was unable to provide me with his proposed draft plan going forward on Tuesday as originally anticipated because of unexpected developments in other matters. He has now advised that he will be able to do so this afternoon. As I will be unavailable for much of the afternoon, it is unlikely that I will be able to review and discuss his proposal. As the parties wish to confer on any issues that may arise, and to carefully consider how they may complete discovery in an efficient manner before moving for an extension of time, this brief extension, if granted by the Court, will allow them to do so. No previous request for an enlargement of the time in which to submit the status report has been made by any party.

We thank the Court for its consideration of the above.

Respectfully submitted,

/s/

Susan P. Scharfstein

cc: Afsan Saleem, Esq. (*by ECF*)